

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CENTAURO LIQUID OPPORTUNITIES :
MASTER FUND, L.P. :

Plaintiff, :

- against - :

ALESSANDRO BAZZONI, CINQUE :
TERRE FINANCIAL GROUP, LTD., :
CT ENERGIA LTD., and CT ENERGIA :
LTD. d/b/a ELEMENTO LTD., :

Defendants. :

15 Civ. 9003 (LTS)(SN)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

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PLEASE TAKE NOTICE THAT, upon the Declaration of Joseph Camillieri, dated August 23, 2018, the Declaration of Edward Cisneros, dated September 28, 2018, the Declaration of Joan Burton Jensen, dated September 27, 2018, the Declaration of Liana Galanti, dated, September 28, 2018, and the Declaration of Michael T. Sullivan, dated September 28, 2018, the Local Rule 56.1 Statement of Elemento Ltd., the accompanying memorandum of law, and all prior pleadings and proceedings had herein, defendant Elemento Ltd., pursuant to Fed. R. Civ. P. 56, will move this Court, Hon. Laura Taylor Swain, in Courtroom 17C of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, for an order granting summary judgment in favor of Elemento on Counts One through Three and dismissing the Amended Complaint as against Elemento in its entirety, with prejudice, and for such other and further relief as is just and appropriate.

PLEASE TAKE FURTHER NOTICE, that pursuant to Magistrate Judge Netburn's September 12, 2018 Order (ECF Doc. No. 216), plaintiff's opposition to this motion shall be

filed by October 29, 2018, and Elemento's reply papers in further support of this motion shall be filed on or before November 12, 2018.

CERTIFICATION: Pursuant to Rule 2(b) of the Court's Individual Practices, counsel for Elemento conferred with counsel for plaintiff and certifies that they used their best efforts to resolve informally the matters raised in this motion, including the exchange of written communications.

Dated: New York, New York
September 28, 2018

SULLIVAN & WORCESTER LLP

By: /s/Michael T. Sullivan
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